

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

RA NIYA GIBSON,
RAYMOND SHAW,

Defendants.

INDICTMENT

CASE NO.

Title 18 United States Code, Section 2;

Title 21, United States Code, Section

841(A)(1), (b)(1)(A), (b)(1)(B),

(b)(1)(C), and 846

JUDGE PEARSON

COUNT 1

(Conspiracy to Possess with Intent to Distribute and Distribute Fentanyl, Methamphetamine, and Cocaine, 21 U.S.C. § 846)

The Grand Jury charges:

1. From in or around June 2023 to in or around December 2024, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants RA NIYA GIBSON, RAYMOND SHAW, and Rayshawn Hall (named but not charged in this indictment) and others known and unknown to the Grand Jury, did knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute over 400 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, over 50 grams of methamphetamine, a Schedule II controlled substance, and over 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(B), and 846.

COUNT 2

(Possession with Intent to Distribute Methamphetamine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

2. On or about October 19, 2023, in the Northern District of Ohio, Eastern Division, Defendant RA NIYA GIBSON and Rayshawn Hall (named but not charged in this indictment) knowingly and intentionally possessed with intent to distribute over 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18 United States Code, Section 2.

COUNT 3

(Possession with Intent to Distribute Cocaine,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury further charges:

3. On or about October 19, 2023, in the Northern District of Ohio, Eastern Division, Defendant RA NIYA GIBSON and Rayshawn Hall (named but not charged in this indictment), knowingly and intentionally possessed with intent to distribute over 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18 United States Code, Section 2.

COUNT 4

(Distribution of Methamphetamine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

4. On or about May 22, 2024, in the Northern District of Ohio, Eastern Division, Defendant RAYMOND SHAW knowingly and intentionally distributed a mixture and substance

containing a detectable amount of methamphetamine, Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

(Distribution of Methamphetamine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

5. On or about June 26, 2024, in the Northern District of Ohio, Eastern Division, Defendant RAYMOND SHAW knowingly and intentionally distributed a mixture and substance containing a detectable amount of methamphetamine, Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

(Distribution of Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

6. On or about June 27, 2024, in the Northern District of Ohio, Eastern Division, Defendant RA NIYA GIBSON knowingly and intentionally distributed a mixture and substance containing a detectable amount of fentanyl, Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

(Distribution of Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

7. On or about July 1, 2024, in the Northern District of Ohio, Eastern Division, Defendant RA NIYA GIBSON knowingly and intentionally distributed a mixture and substance containing a detectable amount of fentanyl, Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

8. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1 through 7 are incorporated herein by reference. As a result of the foregoing offenses, Defendants RA NIYA GIBSON and RAYMOND SHAW shall forfeit to the United States any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of such violations; and any and all of his property used or intended to be used in any manner or part to commit or to facilitate the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.